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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MONET ELIASTAM, ALEXANDER
VAINER, AND RHEANNA BEHUNIAK, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

NBCUNIVERSAL MEDIA, LLC,

Defendant.

Case No. 13 Civ. 4634 (RLE)

**NOTICE OF PLAINTIFFS' MOTION FOR CERTIFICATION OF THE
SETTLEMENT CLASS, FINAL APPROVAL OF THE CLASS ACTION
SETTLEMENT, AND APPROVAL OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of FLSA Settlement ("Plaintiffs' Motion for Final Approval"), in the Declaration of Justin M. Swartz in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of Class Action Settlement, and Approval of the FLSA Settlement, Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and Motion for Approval of Service Awards ("Swartz Decl.") and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) certifying a Settlement Class consisting of:

[A]ll individuals who participated in Unpaid Internships with NBCUniversal Media, LLC, its predecessor, NBC Universal, Inc., and/or its Affiliated Entities, as defined in the Stipulation of Settlement, at any time since July 3, 2007 through the date of this Order if they had an unpaid internship in New York; since February 4, 2010 through the date of this Order if they had an unpaid internship in California; or since February 4, 2011 through the date of this Order if they had an unpaid internship in Connecticut.

- (2) granting final approval of the Stipulation and Settlement Agreement, attached as Exhibit A to the Swartz Declaration;
- (3) granting final approval of the FLSA Settlement; and
- (4) granting any other relief that the Court deems just and proper.

* * *

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as **Exhibit A**, for the Court's convenience.

Dated: April 24, 2015
New York, New York

Respectfully submitted,
OUTTEN & GOLDEN LLP

/s/ Justin M. Swartz

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